

UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas

United States of America )  
v. )  
Santos GONZALEZ MARTINEZ ) Case No. )  
 )  
 )  
 )  
 )  
 )

**Defendant(s)**

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 17, 2024 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1326	A citizen of Mexico, who has previously been REMOVED or has departed the United States while an order of REMOVAL is outstanding was thereafter found in the United States near Hebbronville, Texas the said Defendant having not obtained the consent of the Attorney General of the United States (prior to March 1, 2003) or of the Secretary of the Department of Homeland Security (March 1, 2003 and thereafter- Title 6, United States Code, Sections 202 and 557) for the reapplication by the said Defendant for admission into the United States.

This criminal complaint is based on these facts:

On or about December 17, 2024 the defendant Santos GONZALEZ MARTINEZ was apprehended near Hebbronville, Texas. After a brief interview it was determined that, Santos GONZALEZ MARTINEZ was an undocumented alien from Mexico and subsequently placed under arrest. Further investigation revealed that Santos GONZALEZ MARTINEZ was previously REMOVED from the United States on 11/21/2024 at Hidalgo, Tx. There is no record that Santos GONZALEZ MARTINEZ has applied for or received permission from the Attorney General or the Secretary of Homeland Security to re-enter the United States after deportation.

Continued on the attached sheet.

/S/Adrian J. Davila

**Complainant's signature**

Adrian J. Davila

## Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence,

Date: December 18, 2024

*Judge's signature*

City and state: Laredo, Texas

Christopher dos Santos, U.S. Magistrate Judge  
*Printed name and title*